

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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A.20-02-009
(Filed February 28, 2020) A2002009

Application of Pacific Gas and Electric Company for Compliance Review of Utility Owned Generation Operations, Portfolio Allocation Balancing Account Entries, Energy Resource Recovery Account Entries, Contract Administration, Economic Dispatch of Electric Resources, Utility Owned Generation Fuel Procurement, Diablo Canyon Seismic Studies Balancing Account, and Other Activities for the Record Period January 1 Through December 31, 2019. (U39E)

Application of Southern California Edison Company (U338E) for a Commission Finding that its Procurement-Related and Other Operations for the Record Period January 1 Through December 31, 2019 Complied with its Adopted Procurement Plan; for Verification of its Entries in the Energy Resource Recovery Account and Other Regulatory Accounts; and for Recovery of \$16.065 Million Recorded in Three Accounts.

A.20-04-002
(Filed April 1, 2020)

Application of San Diego Gas & Electric Company (U 902-E) for Approval of: (i) Contract Administration, Least-Cost Dispatch and Power Procurement Activities in 2019, (ii) Costs Related to those Activities Recorded to the Energy Resource Recovery Account, Portfolio Allocation Balancing Account, Transition Cost Balancing Account, and Local Generating Balancing Account in 2019, and (iii) Costs Recorded in Related Regulatory Accounts in 2019.

A.20-06-001
(Filed June 01, 2020)

JOINT CASE MANAGEMENT STATEMENT

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February 25, 2022

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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JOINT CASE MANAGEMENT STATEMENT

Pursuant the *Assigned Commissioner's Second Amended Scoping Memo and Ruling, Notice of Consolidation, and Statutory Deadline Extension* dated September 7, 2021 (Scoping Memo) and Rule 13.9 of the Commission's Rules of Practice and Procedure, San Diego Gas & Electric Company (SDG&E), Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), the Community Choice Aggregator Parties (CCA Parties)¹ and

¹ The CCA Parties include California Choice Energy Authority, Clean Power Alliance of Southern California, East Bay Community Energy, Marin Clean Energy, Peninsula Clean Energy Authority, Pioneer Community Energy, San José Clean Energy, Silicon Valley Clean Energy Authority, and Sonoma Clean Power Authority.

The Utility Reform Network (TURN) jointly² file this case management statement summarizing their meet and confer efforts regarding Phase Two of this proceeding.

I. THE PARTIES' MEET AND CONFER EFFORTS

The Scoping Memo states:

Parties shall meet and confer after service of rebuttal testimony to clarify and narrow contested facts and issues and explore the possibility of settlement prior to evidentiary hearings. Parties shall file a joint case management statement by February 25, 2022 stating whether any party believes a hearing is required. The joint case management statement shall include the following information: (i) the disputed material issues of fact to be addressed in hearings, (ii) the evidence each party proposes to introduce, (iii) the estimated amount of time needed for hearings.³

Similarly, Rule 13.9(a) states that “no later than 10 calendar days after the submission of rebuttal testimony the parties must meet and confer, in person or via remote participation to consider the following:”

- (1) Identifying and, if possible, informally resolving any anticipated motions;
- (2) Identifying the facts and issues in the case that are uncontested and may be the subject of stipulation;
- (3) Identifying the facts and issues in the case that are in dispute;
- (4) Determining whether the contested issues in the case can be narrowed; and
- (5) Determining whether settlement is possible.

On February 15, 2022, the IOUs submitted their joint rebuttal testimony on the service list in this proceeding. Subsequently, on February 18, 2022, all of the parties participated in a meet and confer meeting to address the issues as required by the Scoping Memo and Rule 13.9. The parties hereby summarize the results of their meet and confer efforts below.

² Pursuant to Rule 1.8(d), counsel for SDG&E certifies that he has been fully authorized by PG&E, SCE, Cal Advocates, the CCA Parties and TURN to submit this joint motion on their behalf.

³ Scoping Memo, p. 8.

II. THERE IS NO NEED FOR EVIDENTIARY HEARINGS

The parties are in agreement that there are no material issues of fact in dispute, and therefore, evidentiary hearings are not necessary in this proceeding. Rather, the parties agree that it is appropriate to move forward with briefing following the conclusion of some outstanding discovery and the introduction of testimony and other exhibits into the evidentiary record.

Since evidentiary hearings are not necessary, the parties propose the following procedural mechanism for submitting testimony and other exhibits into the evidentiary record. On or before March 29, 2022, the parties will submit a joint motion to enter testimony and exhibits into the evidentiary record, which would include the proposed exhibit list with the appropriate exhibit designations. This would allow the parties to reference the proposed exhibits numbers set forth in the exhibit list in their respective briefs as necessary. Should any responses to data requests remain outstanding on March 29, 2022, the parties will provide the ALJ with notice via email along with a new anticipated filing date for a joint motion to enter testimony and exhibits into the evidentiary record.

The parties expect that they will be able stipulate to the admission of most if not all the exhibits. In addition, SDG&E, SCE and PG&E stipulate to the admission of the Public / Non-Confidential versions of their data request responses into the evidentiary record.

With respect to briefing, the parties submit the following proposed schedule for the submission of opening and reply briefs:

Opening Briefs	May 6, 2022
Reply Briefs	June 3, 2022

III. RULE 13.9 ISSUES

A. Identifying and, if possible, Informally Resolving any Anticipated Motions

At this point, the parties do not anticipate filing any additional motions in this proceeding, other than a joint motion to move their testimony and exhibits into the record.

B. Identifying the Facts and Issues in the Case that are Uncontested and May be the Subject of Stipulation

The following issues have been raised in the course of the proceeding and are uncontested and/or subject to stipulation:

1. The Joint IOUs' common methodology for calculating unrealized sales due to PSPS events is reasonable and should be approved.

C. Identifying the Facts and Issues in the Case that are in Dispute

The following are the three main issues that remain in dispute and that will be the subject of the parties' briefing:

1. Whether the Joint IOUs' common methodology for calculating unrealized revenues due to PSPS events is reasonable or should be modified to include additional rate components?
2. Whether it is appropriate to include unrealized wholesale generation revenues in the PSPS ratemaking remedy?
3. Whether it is appropriate for the utilities to return the revenue requirement equal to the unrealized volumetric sales and unrealized revenue resulting from the PSPS events in 2019?

D. Determining whether the Contested Issues in the case can be Narrowed

See III.B and III.C above. There are no additional issues that can be narrowed.

E. Determining whether Settlement is Possible

At this point, the parties do not believe settlement is possible but were able to narrow the issues in dispute as set forth above.

IV. CONCLUSION

This concludes the parties' joint case management statement. The parties appreciate the Commission's time and effort in resolving this proceeding in an efficient manner.

Respectfully submitted,

s/ Roger A. Cerda

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February 25, 2022